

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 ELENA L. ALMANZO  
Deputy Attorney General  
4 State Bar No. 131058  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 322-5524  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. **2013- 119**

13 **RAVI RAJESHWAR S. BRAR, A.K.A.**  
14 **RAVI RAJESHWAR SINGBRAR, A.K.A,**  
15 **RAVI BRAR**  
16 **9427 Sea Cliff Way**  
17 **Elk Grove, CA 95758**

**A C C U S A T I O N**

18 **Registered Nurse License No. 778984**

19 Respondent.

20 Complainant alleges:

21 **PARTIES**

22 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
23 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
24 Consumer Affairs.

25 **Registered Nurse License**

26 2. On or about July 19, 2010, the Board issued Registered Nurse License Number  
27 778984 to Ravi Rajeshwar S. Brar, also known as Ravi Rajeshwar Singhbrar, also known as, Ravi  
28 Brar ("Respondent"). The registered nurse license was in full force and effect at all times  
relevant to the charges brought herein and will expire on February 28, 2014, unless renewed.

///

1  
2  
3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
6  
7  
8

2  
3  
4  
5

6  
7  
8  
9

0

1

2

4

7

901

2  
3  
4

## 5

6  
7

8

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
2 enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Criminal Conviction)**

5 8. Respondent has subjected his license to discipline pursuant to Code section 2761,  
6 subdivision (f) in that Respondent has been convicted of the following crime that is substantially  
7 related to the qualifications, functions, and duties of a registered nurse:

8 a. On or about April 25, 2008, in the Superior Court, County of Sacramento, California,  
9 in the matter entitled *People vs. Ravi Rajeshwar Singhbrar*, Case 08T00483, Respondent was  
10 convicted following his plea of no contest to Count 2 of Vehicle Code section 23152 (b) (driving  
11 with .08 percent or more , by weight, of alcohol in ones blood), a misdemeanor.

12 b. On or about November 8, 2011, in the Superior Court, Hayward Hall of Justice,  
13 County of Alameda, California, in the matter entitled *People vs. Ravi Rajeshwar Brar, aka Ravi*  
14 *Brar*, 2011, Case 436851, Respondent was convicted following his plea of no contest to the lesser  
15 charge of Vehicle Code section 23103.5 (a) (wet and reckless), a misdemeanor. The  
16 circumstances of the crime are that on or about August 14, 2011, Respondent was arrested for  
17 driving under the influence of alcohol after he was found to be sleeping in his vehicle on the side  
18 of the road with the keys in the ignition.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Conviction of a Crime Involving Alcohol)**

21 9. Respondent has subjected his license to discipline pursuant to Code section 2761,  
22 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
23 subdivision (c), in that Respondent has been convicted of crimes involving the consumption of  
24 alcohol, as more particularly set forth in paragraph 8, above.

25 **THIRD CAUSE FOR DISCIPLINE**

26 **(Use Alcohol to an Extent or in a Manner Dangerous or Injurious)**

27 10. Respondent has subjected his license to discipline pursuant to Code section 2761,  
28 subdivision (a), on the grounds of unprofessional conduct, as defined in Code section 2762,

1 subdivision (b), in that Respondent used alcohol to an extent or in a manner dangerous or  
2 injurious to himself or others, as more particularly set forth in paragraphs 8 and 9, above.

3 PRAYER


4 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
5 and that following the hearing, the Board of Registered Nursing issue a decision:

6 1. Revoking or suspending Registered Nurse License Number 778984, issued to Ravi  
7 Rajeshwar S. Brar, also known as Ravi Brar;

8 2. Ordering Ravi Rajeshwar S. Brar, also known as Ravi Rajeshwar Singhbrar, also  
9 known as Ravi Brar to pay the Board of Registered Nursing the reasonable costs of the  
10 investigation and enforcement of this case, pursuant to Business and Professions Code section  
11 125.3; and,

12 3. Taking such other and further action as deemed necessary and proper.  
13  
14

15 DATED: August 10, 2012

*for*   
16 LOUISE R. BAILEY, M.ED., RN  
17 Executive Officer  
18 Board of Registered Nursing  
19 Department of Consumer Affairs  
20 State of California  
21 Complainant  
22  
23  
24  
25  
26  
27  
28

SA2012105560  
10910856.doc